

## REMARKS

This Reply is in response to the Final Office Action mailed on October 20, 2004 in which Claims 17-20 were allowed and in which Claims 26-46 were rejected. This Reply is accompanied by a Request for Continuing Examination. Claims 26, 30, 37, 40, 42 and 43 are amended, and Claim 47 is added. Claims 17-20 and 26-47, as amended, are presented for reconsideration and allowance.

### I. Examiner Interview Summary.

On November 30, 2004, a telephonic interview was held between Examiner Nghiem and Applicants' attorney, Todd A. Rathe. The rejection of Claims 26, 37 and 42 based upon Miyazawa, U.S. Patent No. 6,250,750, was discussed. A proposal to amend Claims 26, 37 and 42 which is now amended with this Reply, was discussed. No agreement was reached because it was asserted that such amendments raise new issues requiring further searching consideration. Thus, Applicants have amended Claims 26 and 37 as proposed during the Examiner interview and this response is filed with a Request for Continuing Examination.

Applicants wish to thank Examiner Nghiem for the opportunity to discuss the rejections and for Examiner Nghiem's suggestions for amending the claims to overcome the prior art of record.

### II. Rejection of Claims 26-46 Under 35 U.S.C. § 102(e) Based Upon Miyazawa.

Page 2 of the Office Action rejected Claims 26-46 under 35 U.S.C. § 102(e) as being anticipated by Miyazawa et al., U.S. Patent No. 6,250,750. Claims 26, 37 and 42, as amended, overcome the rejection based upon Miyazawa and are presented for reconsideration and allowance. Claims 27-36, 38-41 and 43-46 depend from independent Claims 26, 37 and 42, respectively, and are believed to be patentably distinct over the prior art of record for the same reasons.

A. Claims 26, 37 and 42.

Claim 26 recites a carriage for an inkjet printer which includes an ink reservoir mounting portion which may be pivoted away from a printhead mounting portion such that the printhead may be removed from the carriage from above the printhead mounting portion without removing the ink reservoir from a secured position on the ink reservoir mounting portion.

Claim 37 recites an inkjet printer which includes a carriage, a printer operably secured to the carriage and an ink reservoir operably secured to the carriage. The ink reservoir is configured to pivot away from the printhead such that the printhead may be removed from above the carriage without removing the ink reservoir from its secured position on the carriage.

Claim 42 recites a carriage for an inkjet printer which includes a printhead operably secured to a first mounting portion and an ink reservoir operably secured to a second mounting portion. The second mounting portion may be moved away from the first mounting portion so as to allow removal of the printhead from the carriage without detaching the ink reservoir from its secured position on the second mounting portion.

Miyazawa fails to disclose a carriage or an inkjet printer having a carriage which is configured so as to allow removal of a printhead from the carriage without detaching the ink reservoir from the carriage. As generally agreed upon during the Examiner interview held on November 30, 2004, recording head 118 of Miyazawa cannot be removed from main body 1 while cartridge 120 remains secured to main body 1. Accordingly, Claims 26, 37 and 42, as amended, are believed to overcome the rejection based upon Miyazawa et al. Claims 27-36, 38-41 and 43-46 depend from Claims 26, 37 and 42 and overcome the rejection for the same reasons.

B. Claims 30, 40 and 43.

Claim 30, as amended, depends from Claim 26 and further recites that the printhead mounting portion is pivotally secured to the ink reservoir mounting portion at a pivot point

and wherein the ink reservoir pivots about the pivot point when pivoting away from the printhead mounting portion.

Claim 40 depends from Claim 37 and additionally recites that the printhead mounting portion is pivotally secured to the ink reservoir mounting portion at the pivot point such that the ink reservoir mounting portion and the reservoir secured to the mounting portion may pivot about the pivot point away from the printhead mounting portion.

Claim 43 depends from Claim 42 and recites that the first mounting portion is pivotally secured to the second mounting portion at a pivot point such that the second mounting portion and the ink reservoir may pivot about the pivot point away from the first mounting portion.

Miyazawa fails to disclose a carriage having an ink reservoir mounting portion that is pivotally secured to a printhead mounting portion at a pivot point such that the ink reservoir mounting portion and the secured ink reservoir may pivot about the pivot point away from the first mounting portion. In contrast, Miyazawa merely discloses a cover body 110 which pivots. As shown by Figures 12(b) and 12(c), pivoting of cover body 110 merely results in lifting of ink cartridge 120. Nowhere does Miyazawa disclose that ink cartridge 120 pivots about the same axis about which cover body 110 or lifter arm 115 pivots. Accordingly, Claims 30, 40 and 43, as amended, overcome the rejection based upon Miyazawa for this additional reason.

III. Rejection of Claims 31, 32, 45 and 46 Under 35 U.S.C. § 103(a) Based Upon Miyazawa and Oda.

Page 7 of the Office Action rejected Claims 31, 32, 45 and 46 under 35 U.S.C. § 103(a) as being unpatentable over Miyazawa et al., U.S. Patent No. 6,250,750, in view of Oda et al., U.S. Patent No. 5,552,816.

Claims 31 and 45, from which Claims 32 and 46 depend, each recite that the printhead is detachably secured to the printhead mounting portion.

Neither Miyazawa nor Oda disclose or suggest a carriage in which the printhead is detachably secured to a printhead mounting portion. Page 7 of the Office Action acknowledges that “Miyazawa et al. does not disclose that said printhead is detachably secured to said printhead mounting portion.” As a result, the Office Action attempts to additionally rely upon Oda et al. and asserts that:

Oda et al. discloses a printhead H being detachably secured to a printhead mounting-portion (see Fig. 1) for the purpose of providing easy access to the printhead by a capping device.

Therefore, it would have been obvious to a person of ordinary skill in the art at the time the invention was made to provide Miyazawa et al. with a detachable printhead as disclosed by Oda et al. for the purpose of providing easy access to the printhead by a capping device.

(Final Office Action, p. 7). However, Oda et al. also fails to disclose a printer that is detachably secured to the printhead mounting portion. The Office Action refers to printhead H. However, element H of Oda is not the printhead but rather a “head cartridge” or “printhead mounting-portion.” Ink-jet recording head 16 of Oda is not disclosed as being detachably secured to head cartridge H. In fact, the construction of recording head 16 in Figure 1 would appear to prevent head 16 from being detached from head cartridge H.

Moreover, even assuming, *arguendo*, that head cartridge H and its recording head 16 could be properly characterized as the printhead, it would not be obvious to modify Miyazawa to alternatively include printhead cartridge H of Oda. It is a well-settled principle that a proposed modification cannot render the prior art unsatisfactory for its intended purpose. (See MPEP 2143.02). One of the purposes of Miyazawa is to lift ink cartridge 120 when cover 110 is pivoted to an open position. To alternatively replace recording head 118 with the entire printhead cartridge H of Oda would seemingly inhibit this intended purpose of Miyazawa. Furthermore, neither Miyazawa nor Oda et al. provide any teaching or suggestion as to how Miyazawa could in fact be modified to utilize printhead cartridge H of Miyazawa. The alleged combination of Miyazawa and Oda would require a complete reconstruction of Miyazawa and would therefore not be obvious to one of ordinary skill in the art absent using Applicants’ own disclosure as a blueprint. Thus, the rejection of Claims 31 and 45 based

upon the combination of Miyazawa and Oda is improper for this additional reason and should be withdrawn. Claims 32 and 46 depend from Claims 31 and 45 and are believed to be patentably distinct over Miyazawa and Oda for the same reasons.

IV. Added Claim.

With this response, Claim 47 is added. Claim 47 recites a carriage for an inkjet printer including a printhead mounting portion and an ink reservoir mounting portion. The ink reservoir mounting portion is pivotally coupled to the printhead mounting portion about an axis. The ink reservoir mounting portion is configured to pivot a secured ink reservoir about the axis between a first position in which the ink reservoir is connected to a printhead secured by the printhead mounting portion and a second position in which the ink reservoir is withdrawn from the printhead.

Neither Miyazawa nor the prior art of record discloses a carriage having an ink reservoir mounting portion pivotally coupled to a printhead mounting portion about an axis and configured to pivot an ink reservoir secured to the ink reservoir mounting portion about the axis between a first position in which the ink reservoir secured to the ink reservoir mounting portion is connected to the printhead secured by the printhead mounting portion and a second position in which the ink reservoir is withdrawn from the printhead. For example, Miyazawa fails to disclose that an ink cartridge 20 pivots about an axis. Moreover, Miyazawa fails to disclose that ink cartridge 120 pivots about the same axis about which either cover body 110 or arm 115 pivots. Thus, added Claim 47 is presented for consideration and allowance.

V. Conclusion.

After amending the claims as set forth above, claims 17-20 and 26-47 are now pending in this action.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 06-1447. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 06-1447. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 06-1447.

Respectfully submitted,

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